

Exhibit 3

From: Layne Hilton
To: lockardv@gtlaw.com; ruben@honiklaw.com
Cc: DECValsartan@btlaw.com; rgeman@lchb.com; mpatronella@classlawdc.com; nmigliaccio@classlawdc.com; kmadiraju@lchb.com; valpec@kirtlandpackard.com; David J. Stanoch; OstfeldG@gtlaw.com; DTDorner@duanemorris.com; DKlinges@duanemorris.com
Subject: Re: Valsartan - Craft Deposition
Date: Wednesday, January 5, 2022 4:52:31 PM

Hi Victoria:

We hope that we can avoid the Court's intervention on this matter (especially because Plaintiffs' counsel will be participating remotely as well). However, if Ms. Craft's wishes remain the same by the next discovery CMC on January 18th, and Defendants have not confirmed whether they will assent to a fully remote deposition, please note that Plaintiffs will raise the issue with the Special Master at that time.

Best,

Layne

From: "lockardv@gtlaw.com" <lockardv@gtlaw.com>
Date: Wednesday, January 5, 2022 at 3:29 PM
To: Layne Hilton <l.hilton@kanner-law.com>, "ruben@honiklaw.com" <ruben@honiklaw.com>
Cc: "DECValsartan@btlaw.com" <DECValsartan@btlaw.com>, "rgeman@lchb.com" <rgeman@lchb.com>, "mpatronella@classlawdc.com" <mpatronella@classlawdc.com>, "nmigliaccio@classlawdc.com" <nmigliaccio@classlawdc.com>, "kmadiraju@lchb.com" <kmadiraju@lchb.com>, Valsartan PEC <valpec@kirtlandpackard.com>, "David J. Stanoch" <d.stanoch@kanner-law.com>, "OstfeldG@gtlaw.com" <OstfeldG@gtlaw.com>, "DTDorner@duanemorris.com" <DTDorner@duanemorris.com>, "DKlinges@duanemorris.com" <DKlinges@duanemorris.com>
Subject: RE: Valsartan - Craft Deposition

Hi Layne,

We are discussing the request below among defense counsel, but given how quickly things change with these waves, we think it makes sense to revisit closer in time to the deposition.

Thanks, Victoria

Victoria Davis Lockard
Shareholder
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From: Layne Hilton <l.hilton@kanner-law.com>
Sent: Tuesday, January 4, 2022 5:04 PM
To: Ruben Honik <ruben@honiklaw.com>; Lockard, Victoria D. (Shld-Atl-LT) <lockardv@gtlaw.com>
Cc: DECValsartan@btlaw.com; rgeman@lchb.com; mpatronella@classlawdc.com; nmigliaccio@classlawdc.com; kmadiraju@lchb.com; valpec@kirtlandpackard.com; David J. Stanoch <dj.stanoch@kanner-law.com>
Subject: Valsartan - Craft Deposition

Victoria:

I write regarding the deposition of Laura Craft.

Ms. Craft has requested that her deposition (set for February 9th) be conducted remotely via Zoom. While Ms. Craft was initially prepared personally appear for her deposition, given the current COVID case trajectory of the last few weeks, she no longer wishes to proceed in that manner. Ms. Craft has recently started caring for a newborn grandchild in the evenings, and she believes the risks are too high given the totality of the circumstances.

To respect her wishes, Plaintiffs will be appearing remotely as well.

Please confirm that Defendants will agree with this request.

Best,

Layne Hilton

From: Layne Hilton
Sent: Wednesday, December 15, 2021 1:43 PM
To: Ruben Honik <ruben@honiklaw.com>; lockardv@gtlaw.com
Cc: DECValsartan@btlaw.com; rgeman@lchb.com; mpatronella@classlawdc.com; nmigliaccio@classlawdc.com; kmadiraju@lchb.com; valpec@kirtlandpackard.com; David J. Stanoch <dj.stanoch@kanner-law.com>
Subject: RE: Deposition date for Dr. Kaplan - Med Mon

Victoria:

We confirm the following locations for the class expert depositions:

Conti: Boston, MA

Craft: Near Emeryville, CA (Bay Area)

Najafi: Near Alameda, CA (Bay Area)

Quick: Austin, TX

Panagos: Miami, FL
Kaplan: Chicago, IL
Song: Boston, MA

Thanks,

Layne

From: Ruben Honik <ruben@honiklaw.com>
Sent: Tuesday, December 14, 2021 12:23 PM
To: lockardv@gtlaw.com
Cc: Layne Hilton <l.hilton@kanner-law.com>; DECValsartan@btlaw.com; rgeman@lchb.com; mpatronella@classlawdc.com; nmigliaccio@classlawdc.com; kmadiraju@lchb.com; valpec@kirtlandpackard.com; David J. Stanoch <d.stanoch@kanner-law.com>
Subject: Re: Deposition date for Dr. Kaplan - Med Mon

We are not holding the following day for any of the experts and are proposing limiting the duration of the examination of several of these experts. Our position will be reflected in the agenda letter soon to be sent to the court and defense counsel.

Others on our team will address the remaining "logistical" questions you raise.

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On Dec 10, 2021, at 12:35 PM, lockardv@gtlaw.com wrote:

We can set January 19th for Kaplan. Do you have dates for Conti?

Also can you confirm all the experts are holding the following day in case we need it?

Can you also confirm location for all?

Victoria Davis Lockard
Shareholder

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From: Layne Hilton <l.hilton@kanner-law.com>
Sent: Monday, December 6, 2021 3:01 PM
To: 'DECValsartan@btlaw.com' <DECValsartan@btlaw.com>
Cc: rgeman@lchb.com; Mark Patronella <mpatronella@classlawdc.com>; nmigliaccio@classlawdc.com; kmadiraju@lchb.com; valpec@kirtlandpackard.com; David J. Stanoch <d.stanoch@kanner-law.com>
Subject: [EXTERNAL]Deposition date for Dr. Kaplan - Med Mon

EXTERNAL TO GT

Counsel:

We can provide either January 19th or February 2nd for Dr. Kaplan's deposition. Please let me know whether either of these dates works for Defendants.

Thanks,

Layne

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